

UNITED STATES OF AMERICA
THE STATE OF WISCONSIN

Plaintiffs

v.

NCR CORPORATION
APPLETON PAPERS INC.
BROWN COUNTY
CITY OF APPLETON
CITY OF GREEN BAY
CBC COATING, INC.
GEORGIA-PACIFIC CONSUMER PRODUCTS LP
KIMBERLY-CLARK CORPORATION
MENASHA CORP.
NEENAH-MENASHA SEWERAGE COMMISSION
NEWPAGE WISCONSIN SYSTEMS, INC.
P.H. GLATFELTER CO.
U.S. PAPER MILLS CORP.
WTM I COMPANY

Defendants

Defendant NewPage Wisconsin Systems, Inc. (“NewPage”) respectfully seeks an Order giving NewPage until March 23, 2011 to respond to Plaintiffs’ motion to strike NewPage’s counterclaim.

1) Undersigned counsel is authorized to represent to the Court that Plaintiffs' have no objection to the Court's allowing NewPage's motion

2) The last of Co-Defendants' Responses to Plaintiffs' motion to strike their respective counterclaims are to be filed by March 21, 2011.

3) It is NewPage's expectation that, upon review of Co-Defendants' Responses, that NewPage will be able to adopt Co-Defendants' Responses, or substantial portions thereof.

4) Adoption will allow for one less brief / memo to read, for the Plaintiffs for any Reply they may consider filing, as well as for the Court in deciding the motion to strike.

5) The Plaintiffs' time to Reply should be determined from the date of the last-filed Response, which, upon the Court allowing this motion, will be March 23, 2011.

WHEREFORE, NewPage prays its unopposed motion be allowed, and the time to file its Response be extended to March 23, 2011.

Respectfully submitted this 15th day of March 2011

NEWPAGE WISCONSIN SYSTEMS INC.

By: /s/ Daniel C. Murray

Daniel C. Murray
JOHNSON & BELL, LTD.
33 West Monroe Street Suite 2700
Chicago, Illinois 60603-5404
Tel. 312 984 0226
murrayd@jbld.com

Certificate of Service

I hereby certify that on March 15, 2011 I electronically filed the attached ***NEWPAGE WISCONSIN SYSTEMS INC.'s UNOPPOSED MOTION*** with the Clerk of the Court using the CM/ECF system, thereby sending notification of such filing to all Registered Users.

/s/ Letitia M. Reyes

JOHNSON & BELL, LTD.
Suite 2700
33 West Monroe Street
Chicago, IL 60603-5404

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